

**KHALE J. LENHART, #7-4581**  
**TYSON R. WOODFORD, #8-6650**  
Hirst Applegate, LLP  
P. O. Box 1083  
Cheyenne, WY 82003-1083  
Phone: (307) 632-0541  
Fax: (307) 632-4999  
[klenhart@hirstapplegate.com](mailto:klenhart@hirstapplegate.com)  
[twoodford@hirstapplegate.com](mailto:twoodford@hirstapplegate.com)

**MARC FEINSTEIN** (*pro hac vice*)  
**WILLIAM PAO** (*pro hac vice*)  
O'Melveny & Myers  
400 South Hope Street  
Los Angeles, CA 90071-2899  
Phone: (213) 430-6000  
Fax: (213) 430-6407  
[mfeinstein@omm.com](mailto:mfeinstein@omm.com)  
[wpao@omm.com](mailto:wpao@omm.com)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON  
BLOCKCHAIN, a Wyoming limited  
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER  
LLC, a Delaware limited liability company;  
MINEONE PARTNERS LLC, a Delaware  
limited liability company; TERRA  
CRYPTO INC., a Delaware corporation;  
BIT ORIGIN, LTD., a Cayman Island  
Company; SONIC HASH LLC, a Delaware  
limited liability company; BITMAIN  
TECHNOLOGIES HOLDING COMPANY,  
a Cayman Island Company; BITMAIN  
TECHNOLOGIES GEORGIA LIMITED, a  
Georgia corporation; and JOHN DOES  
1-18, related persons and companies who  
control or direct some or all of the named  
Defendants,

Defendants.

**STIPULATION TO PROTECTIVE ORDER**

HIRST APPLGATE, LLP  
LAW OFFICES  
P.O. BOX 1083  
CHEYENNE, WYOMING 82003-1083

Defendant Bitmain Technologies Georgia Limited (“Bitmain Georgia”) hereby provides notice that it stipulates to, accepts, and agrees with the entry of the *Stipulated Protective Order*, entered by the Court on December 6, 2023.

Dated: 8 February 2024.

BITMAIN TECHNOLOGIES GEORGIA  
LIMITED, Defendant

BY: 

**KHALE J. KLENHART, #7-4581**  
**TYSON R. WOODFORD, #8-6650**  
OF HIRST APPELATE, LLP  
Attorneys for Defendant Bitmain  
P. O. Box 1083  
Cheyenne, WY 82003-1083  
Phone: (307) 632-0541  
Fax: (307) 632-4999  
[klenhart@hirstapplegate.com](mailto:klenhart@hirstapplegate.com)  
[twoodford@hirstapplegate.com](mailto:twoodford@hirstapplegate.com)

and for

**MARC FEINSTEIN (*pro hac vice*)**  
**WILLIAM PAO (*pro hac vice*)**  
O’Melveny & Myers  
400 South Hope Street  
Los Angeles, CA 90071-2899  
Phone: (213) 430-6000  
Fax: (213) 430-6407  
[mfeinstein@omm.com](mailto:mfeinstein@omm.com)  
[wpao@omm.com](mailto:wpao@omm.com)

***CERTIFICATE OF SERVICE***

I certify the foregoing *Stipulation to Protective Order* was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 8 February 2024, and that copies were served as follows:

Patrick J. Murphy, #5-1779  
Scott C. Murray, #7-4896  
Williams, Porter, Day & Neville, P.C.  
159 North Wolcott, Suite 400  
P. O. Box 10700  
Casper, WY 82602-3902  
[pmurphy@wpdn.net](mailto:pmurphy@wpdn.net)  
[smurray@wpdn.net](mailto:smurray@wpdn.net)  
*Attorneys for Plaintiff*


☐ U.S. MAIL  
☐ FED EX  
☐ FAX  
☐ HAND DELIVERED  
☐ EMAIL  
☒ E-FILE

Sean M. Larson, #7-5112  
Kari Ann Hartman, #8-6507  
Hathaway & Kunz, LLP  
P. O. Box 1208  
Cheyenne, WY 82003-1208  
[slarson@hkwyolaw.com](mailto:slarson@hkwyolaw.com)  
[khartman@hkwyolaw.com](mailto:khartman@hkwyolaw.com)  
*Attorneys for Defendants Mineone, Terra Crypto, Bit  
Origin, Sonichash*

☐ U.S. MAIL  
☐ FED EX  
☐ FAX  
☐ HAND DELIVERED  
☐ EMAIL  
☒ E-FILE

Paula Colbath, *Pro Hac Vice*  
Sarah Levitan Perry, *Pro Hac Vice*  
Loeb & Loeb, LLP  
345 Park Avenue  
New York, NY 10154  
[pcolbath@loeb.com](mailto:pcolbath@loeb.com)  
[sperry@loeb.com](mailto:sperry@loeb.com)  
*Attorneys for Defendants Mineone, Terra Crypto, Bit  
Origin, Sonichash*

☐ U.S. MAIL  
☐ FED EX  
☐ FAX  
☐ HAND DELIVERED  
☐ EMAIL  
☒ E-FILE

  
OF HIRST APPLEGATE, LLP  
Attorneys for Defendant Bitmain